

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NEVERSINK GENERAL STORE and
BRENDA TOMLINSON, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

MOWI USA, LLC, MOWI DUCKTRAP,
LLC, MOWI USA HOLDING, LLC, and
MOWI ASA,

Defendants.

Case No. 1:20-cv-09293-PAE

**PLAINTIFFS' NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
AWARD OF ATTORNEYS' FEES TO
PLAINTIFFS' COUNSEL,
REIMBURSEMENT OF LITIGATION
EXPENSES, AND SERVICE AWARDS
TO THE CLASS REPRESENTATIVES**

TO DEFENDANTS AND ALL INTERESTED PARTIES:

Plaintiffs¹ Neversink General Store and Brenda Tomlinson (“Plaintiffs”), respectfully provide notice that on November 19 at 2:00 p.m. they will move before the Honorable Paul A. Engelmayer at the United States District Court for the Southern District Court of New York in Courtroom 1305 at 40 Centre Street, New York, NY for an Order awarding Attorneys’ Fees, Reimbursement of Litigation Expenses, and Service Awards for the Class Representatives. In support of this Motion, Plaintiffs rely on the attached Memorandum of Law in Support of Plaintiffs’ Unopposed Motion for Award of Attorneys’ Fees to Plaintiffs’ Counsel, Reimbursement of Litigation Expenses, and Service Awards to the Class Representatives; the Declarations of Jonathan Shub and Gary M. Klinger in Support of Plaintiffs’ Motion; and their supporting exhibits, all documents filed therewith, and the arguments of counsel.

Respectfully submitted on this 11th of August, 2021

SHUB LAW FIRM LLC

By: Jonathan Shub
Jonathan Shub
Kevin Laukaitis
134 Kings Hwy. E., 2nd Floor
Haddonfield, NJ 08033
T: (856) 772-7200
F: (856) 210-9088
jshub@shublawyers.com
klaukaitis@shublawyers.com

¹ Unless otherwise indicated, all capitalized terms shall have the same meaning as in the Settlement Agreement. (*See generally* Class Settlement Agreement, ECF No. 67-1.) References to “§ __” are to sections in the Settlement Agreement.

MASON LIETZ & KLINGER LLP

Gary M. Klinger (admitted pro hac vice)

227 W. Monroe Street, Ste. 2100

Chicago, Illinois 60606

T: 202.640.1160

F: 202.429.2294

gklinger@masonllp.com

MASON LIETZ & KLINGER LLP

Gary E. Mason (admitted pro hac vice)

5101 Wisconsin Ave. NW Ste. 305

Washington, DC 20016

T: 202.640.1160

F: 202.429.2294

gmason@masonllp.com

Court Appointed Class Counsel

CERTIFICATE OF SERVICE

I, Jonathan Shub, hereby certify that on August 11, 2021, I caused an electronic copy of the foregoing document to be served on all counsel of record via the Court's CM/ECF system.

/s/ Jonathan Shub

Jonathan Shub